

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RAYMOND L. BECTON,

Plaintiff,

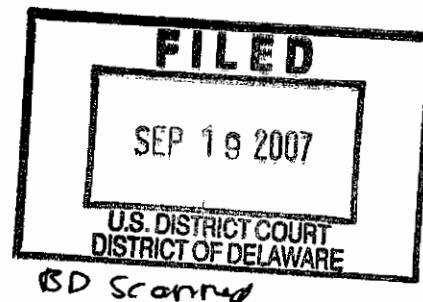
v.

Civil Action No. 06-791-SLR

Jury Trial Requested

MRS. PAMELA A. MINOR, MRS.
CHERYL REGAN, MR. SANLEY W.
TAYLOR, and WARDEN RAPHAEL
WILLIAMS.

Defendants.



Plaintiff Raymond L. Becton is requesting of the United States District Court to grant Plaintiff an extension of time to complete and file to the court the answer to Defendant's combined first set of interrogatories and requests for production of documents which has been directed to Plaintiff.

COME NOW, Plaintiff pro se Raymond L. Benton, hereby Request of the District Court in Response to Defendant's Pamela A. Minor, Cheryl Ragan and Warden Raphael Williams motion for Production of Documents on Raymond L. Benton's Complaint, dated December 20, 2006 and filed December 27, 2006, for the reasons as follows:

1. ON AUGUST 28, 2007, Plaintiff was TRANSFERRED FROM the Webb Facility to the Plumree Center / Work Release Program to his Level 4 Crest Work / Release, ordered by the Parole Board on July 24, 2007.

2. Upon arrival on intake, C/O JACKSON, first explain to Plaintiff he was not a Crest Resident, that he would be housed in the down stairs Heeron Building.

3. Plaintiff was Taken before MRS. MAXIM whom was to interview Plaintiff along with Counselor MS. CARROLL EDANS.

4. Therefore, at the meeting, Plaintiff was instructed he was a resident of the Plumree Center

work Release Program by MRS. MAXIM and MS. CARROLL EVANS.

5. PLAINTIFF asked MRS. MAXIM was he not ordered by the Parole Board to complete the Crest Program, She responded and said "NO you're not in the Crest Program, along with MS. CARROLL EVANS.

6. PLAINTIFF was directed to the Heron Building, down stairs work Release Resident.

7. MRS. MAXIM two days after my arrival to the Plummer Center retired and was replaced by MS. CARROLL EVANS.

8. PLAINTIFF immediately, placed a slip to request the new treatment counselor, MS. CARROLL EVANS to allow Resident the opportunity to proceed to the Widener College's Law Library, to respond to the recent received motion for production of documents which was mailed to PLAINTIFF three days after arrival to the Plummer Center.

9. Treatment Counselor, CARROLL EVANS called to the Widener College to make confirmation the school allowed the Community Residents the opportunity

to participate in the use of the Law Library. Someone confirmed her call that the Community Residents was in fact authorized to participate in the use of the Law Library, under First Come First Served.

10. Furthermore, MS. EVANS explained to Resident since it was confirmed and allowed by Widener College, Plaintiffs could obtain a pass to go to the Law Library at the College. The date of this conversation was approximately, Monday September 3, 2007.

11. However, since that date and time, the three counselors, MS. Hamilton, MRS. Lang, MS. EVANS all have deliberately been indifferent and indirect to Plaintiff's Request to go to the Law Library.

12. Inasmuch, Treatment Counselor MS. Carroll EVANS and Plaintiff had a meeting the same week, however, Plaintiff has yet to be allowed to go to the Law Library.

13. Therefore, because of the many denials and Refusals of the Staff to allow Plaintiff the opportunity to prepare the Answer to Defendant's motion, Plaintiff Request the Court to allow for

an extension of time which Plaintiff will have the opportunity to answer Defendant's motion for Production of Documents in Plaintiff's case.

14. Moreover, it does not surprise or amaze Plaintiff, this new maneuver the defendant's the staff of DOJ and the Justice Department has chose to do this time and before when Plaintiff was sentenced in 1981, on this charge; Plaintiff is serving a sentence of 25 years on a charge of Delivery of Heroin, one bag of Heroin, worth \$40.00 dollars, First drug offense and conviction to an informant working for the Wilmington, Police Department.

15. Plaintiff has brought this issue before the courts in Delaware, Federal and State, with no avail, no court will accept the responsibility to change what every court realizes is an illegal sentence which every court has acknowledged.

16. However, this latest in Justice to deny Plaintiff the opportunity to walk into the District Court of Delaware or to proceed to the witness camp, located on 202 Concord Pike, after MS. CARROLL EVANS, treatment counselor called

the Campus, Confirmed that the Local Community has the Freedom to participate in the Law Library which she was informed on the phone, that their policy allowed Community Residents to use their Law Library.

17. However, at this date and time, Ms Carroll Evans and her staff has not consented or granted Plaintiff a pass to the 202 Concord Campus, after confirming the Motion for Production of Documents mailed to Plaintiff on August 31, 2007, received on Saturday September 1, 2007, from the Mail Room located here in the Plummer Center/Work Release Facility.

18. Further more, Dis Crimination has been the normal routine, handed down to Plaintiff, from the first day Plaintiff was charged in the original indictment of the Delivery of Herion Charge in the Superior Court of Wilmington, DE Lawfare.

Wherefore, the Reasons Mention in the above written paragraphs, Plaintiff is seeking and requesting from the District Court of Wilmington, DE, an Extension of time, a month and 15 days which would be concluded October 31, 2007, to answer the

Defendants Motion For Production of Documents
in the District Court of Wilmington, Delaware
on August 31, 2007.

Raymond L. Bruton

Raymond L. Bruton

SB2 #0 69025

Plummer Carter / Work Release

38 Todds Lane

Wilmington, DE 19802

Dated; September 16, 2007

CERTIFICATE OF SERVICE

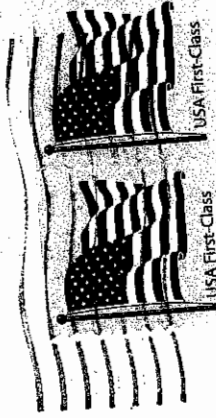
I Raymond L. Benton hereby certify that on September 17, 2007, I caused a true and correct copy of the attached motion for Request of An Extension of time directed to Defendants to be served on the following individual in the form and manner indicated:

TO: Erika Y. Foss (#4506)
Deputy Attorney General
Delaware Department of Justice
Carol State Office Building
820 N. French Street, 6th Floor
Wilmington, DE 19801

Two True copies by first class mail, postage prepaid, to each Recipient

Raymond L. Benton
SBI #069025
Plummer Carter/Welch/Boyle
38 Todd's Lane
Wilmington, DE 19802

Mr. Raymond L. Beaton
SBI #869025
Plummer Carter/Walk Release
38 Todd's Lane
Wilmington, DE 19802



Office of the Clerk
United States District Court
844 N. King Street, Lock Box 18
Wilmington, DE 19801-3570

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